

EXHIBIT 1

Console Mattiacci Law LLC
Ruth V. Briggs vs. Temple University

Attorney	Total Hours	Rate	Total Amount
Laura C. Mattiacci	231.30	750	\$173,475.00
Rahul Munshi	485.40	440	\$213,576.00
Stephen G. Console	19.20	940	\$18,048.00
			Total \$405,099.00

Bill Date	Client	Attorney	Description	Dur/Qty
Laura C. Mattiacci				
1/20/2016	Ruth V. Briggs	LCM	Review all documents in trial binder review and revise complaint. Emails to and from Rahul Munshi.	1.50
3/1/2016	Ruth V. Briggs	LCM	Review article in case. Emails to and from Rahul Munshi.	0.10
6/18/2018	Ruth V. Briggs	LCM	Work on trial prep.	6.00
6/19/2018	Ruth V. Briggs	LCM	Work on trial prep.	7.00
6/20/2018	Ruth V. Briggs	LCM	Work on trial prep.	3.00
6/21/2018	Ruth V. Briggs	LCM	Work on trial prep.	6.00
6/22/2018	Ruth V. Briggs	LCM	Work on trial prep.	2.00
6/25/2018	Ruth V. Briggs	LCM	Work on trial prep.	4.00
6/26/2018	Ruth V. Briggs	LCM	Work on trial prep.	5.00
6/27/2018	Ruth V. Briggs	LCM	Work on trial prep.	4.50
6/28/2018	Ruth V. Briggs	LCM	Work on trial prep.	6.50
6/29/2018	Ruth V. Briggs	LCM	Work on trial prep.	3.50
7/2/2018	Ruth V. Briggs	LCM	Work on trial prep.	4.00
7/3/2018	Ruth V. Briggs	LCM	Work on pretrial submissions, review and digest depositions. Review documents.	7.50
7/5/2018	Ruth V. Briggs	LCM	Work on pretrial submissions, review and digest depositions. Review documents.	9.50
7/6/2018	Ruth V. Briggs	LCM	Work on pretrial submissions, review and digest depositions. Review documents.	8.00
7/7/2018	Ruth V. Briggs	LCM	Work on Direct and crosses.	6.20
7/8/2018	Ruth V. Briggs	LCM	Work on Direct and crosses.	6.50
7/9/2018	Ruth V. Briggs	LCM	Work on Voir Dire, jury instructions, verdict sheet, motions in limine.	9.50
7/10/2018	Ruth V. Briggs	LCM	Work on Voir Dire, jury instructions, verdict sheet, motions in limine.	10.50
7/11/2018	Ruth V. Briggs	LCM	Review file and documents and deposition transcripts. Work on cross examinations. Conferences with Rahul Munshi and Steve Console regarding trial.	11.50
7/12/2018	Ruth V. Briggs	LCM	Review file and documents and deposition transcripts. Work on cross examinations. Conferences with Rahul Munshi and Steve Console regarding trial.	12.00
7/13/2018	Ruth V. Briggs	LCM	Review file and documents and deposition transcripts. Work on cross examinations. Conferences with Rahul Munshi and Steve Console regarding trial.	13.00
7/14/2018	Ruth V. Briggs	LCM	Review file and documents and deposition transcripts. Work on cross examinations. Conferences with Rahul Munshi and Steve Console regarding trial.	11.50
7/15/2018	Ruth V. Briggs	LCM	Review file and documents and deposition transcripts. Work on cross examinations. Conferences with Rahul Munshi and Steve Console regarding trial.	13.00
7/16/2018	Ruth V. Briggs	LCM	Prepare for and attend trial.	15.00
7/17/2018	Ruth V. Briggs	LCM	Prepare for and attend trial.	15.00
7/18/2018	Ruth V. Briggs	LCM	Prepare for and attend trial.	15.00
7/19/2018	Ruth V. Briggs	LCM	Prepare for and attend trial.	9.00
7/20/2018	Ruth V. Briggs	LCM	Legal research on post-trial issues. Conference regarding post-trial motions, front page, attorneys fees.	2.00
7/23/2018	Ruth V. Briggs	LCM	Legal research on post trial issues and front pay. Emails to and from Rahul Munshi and Steve Console regarding front pay and appeal issues.	1.00
7/24/2018	Ruth V. Briggs	LCM	Legal research on post trial issues. Telephone conferences with Rahul Munshi and Steve Console regarding front pay and appeal issues.	1.50
7/25/2018	Ruth V. Briggs	LCM	Telephone conference with Rahul Munshi regarding post-trial issues. Telephone conference with opposing counsel regarding post-trial motions. Telephone conference with the court. Emails to and from Steve Console and Rahul Munshi regarding post-trial issues.	1.00
Total Hours for Laura Mattiacci				231.30

Rahul Munshi				
5/14/2014	Ruth V. Briggs	RM	Initial Consultation PNC, Ruth Briggs, Document review	2.00
6/23/2014	Ruth V. Briggs	RM	Review documents from PNC, Ruth Briggs	0.50
6/26/2014	Ruth V. Briggs	RM	Review documents from PNC, Ruth Briggs; e-mail with Ruth Briggs	1.00
7/2/2014	Ruth V. Briggs	RM	Follow up Initial Consultation; internal conference with Briggs	1.50
7/8/2014	Ruth V. Briggs	RM	Telephone conference with Briggs; e-mails with Briggs	0.70
8/5/2014	Ruth V. Briggs	RM	Telephone conference with client; e-mails with client	1.00
8/20/2014	Ruth V. Briggs	RM	E-mails with Ruth Briggs; review notes from Briggs	0.20
8/21/2014	Ruth V. Briggs	RM	Telephone conference with Ruth Briggs	0.30
9/2/2014	Ruth V. Briggs	RM	E-mails with client; review documents from client	0.20
9/11/2014	Ruth V. Briggs	RM	E-mails with client; review documents from client	0.20
9/17/2014	Ruth V. Briggs	RM	E-mails and voice mail from Ruth Briggs; review position statement and comments from Ruth Briggs	0.80
10/1/2014	Ruth V. Briggs	RM	E-mails with Ruth Briggs; review notes from Briggs	0.50
10/6/2014	Ruth V. Briggs	RM	E-mails with Ruth Briggs	0.20
10/7/2014	Ruth V. Briggs	RM	Review e-mails and notes from Ruth Briggs	0.50
10/8/2014	Ruth V. Briggs	RM	Position statement and exhibit review; drafted rebuttal; e-mails with Ruth Briggs	4.50
10/9/2014	Ruth V. Briggs	RM	Drafted amended charge; e-mails with Ruth Briggs	1.00
10/15/2014	Ruth V. Briggs	RM	Review amended charge	0.10
10/21/2014	Ruth V. Briggs	RM	E-mails with Ruth Briggs; telephone conference with Briggs; prepared letter to opposing counsel	1.00
10/24/2014	Ruth V. Briggs	RM	Drafted rebuttal and demand to opposing counsel; emails with Briggs	2.00
10/29/2014	Ruth V. Briggs	RM	E-mails with Ruth Briggs; drafted rebuttal; document review from client	0.80
10/30/2014	Ruth V. Briggs	RM	E-mail with Ruth Briggs; revised demand letter and rebuttal to EEOC	0.70
11/6/2014	Ruth V. Briggs	RM	Telephone conference with opposing counsel and preparation; voice mail from Ruth Briggs	0.50
11/10/2014	Ruth V. Briggs	RM	Telephone conference with Ruth Briggs	0.40
11/21/2014	Ruth V. Briggs	RM	E-mail with opposing counsel; review position statement	0.80
12/16/2014	Ruth V. Briggs	RM	Review position statement; e-mail with Ruth Briggs	0.30
2/24/2015	Ruth V. Briggs	RM	voice mail and emails with client	0.20
2/25/2015	Ruth V. Briggs	RM	Telephone conference with client; file review	0.50
9/15/2015	Ruth V. Briggs	RM	Telephone conference with client	0.10
9/16/2015	Ruth V. Briggs	RM	Telephone conference with client	0.20
11/2/2015	Ruth V. Briggs	RM	Telephone conference with Ruth Briggs	0.50
11/5/2015	Ruth V. Briggs	RM	Internal conference with client; document review	2.50

12/18/2015	Ruth V. Briggs	RM	E-mail with Ruth Briggs	0.20
1/4/2016	Ruth V. Briggs	RM	Drafted complaint; e-mail with Ruth Briggs	2.50
1/6/2016	Ruth V. Briggs	RM	E-mails with Ruth Briggs	0.20
1/8/2016	Ruth V. Briggs	RM	E-mails with Ruth Briggs; telephone conference with Ruth Briggs	1.00
1/14/2016	Ruth V. Briggs	RM	Trial binder preparation for litigation; revisions to complaint; e-mails with Ruth Briggs	1.50
1/18/2016	Ruth V. Briggs	RM	Trial binder preparation for litigation; e-mails with Ruth Briggs	0.50
1/29/2016	Ruth V. Briggs	RM	Telephone conference with opposing counsel and prep for Telephone conference	0.50
2/1/2016	Ruth V. Briggs	RM	Telephone conference with client	0.30
2/4/2016	Ruth V. Briggs	RM	Email with opposing counsel; email with client	0.20
2/5/2016	Ruth V. Briggs	RM	Telephone conference with opposing counsel, emails with client, file review	1.00
3/28/2016	Ruth V. Briggs	RM	Emails with opposing counsel and court	0.30
4/1/2016	Ruth V. Briggs	RM	Prep for Rule 16 conference; Telephone conference with OC	1.00
4/4/2016	Ruth V. Briggs	RM	Rule 16 conference with court; email with client; prep for Rule 16	1.10
4/5/2016	Ruth V. Briggs	RM	emails with client	0.20
4/6/2016	Ruth V. Briggs	RM	emails with client	0.20
4/8/2016	Ruth V. Briggs	RM	Telephone conference with client; drafted discovery requests; file review	2.00
5/26/2016	Ruth V. Briggs	RM	emails with opposing counsel; reviewed Defendant's discovery responses	1.00
5/31/2016	Ruth V. Briggs	RM	emails with opposing counsel	0.20
6/1/2016	Ruth V. Briggs	RM	Telephone conference with opposing counsel; emails with opposing counsel; file review	1.00
6/9/2016	Ruth V. Briggs	RM	Telephone conference with client; email with opposing counsel	1.00
6/10/2016	Ruth V. Briggs	RM	emails with Opposing counsel; prep for depositions	2.00
6/13/2016	Ruth V. Briggs	RM	emails with opposing counsel; drafted joint motion for extension; telephone conference with client	2.50
6/14/2016	Ruth V. Briggs	RM	emails with opposing counsel	0.20
6/15/2016	Ruth V. Briggs	RM	revised motion to court on extension; emails with opposing counsel; Legal Research on motivating factor	1.50
6/27/2016	Ruth V. Briggs	RM	emails with client; prep for dep with client	1.10
6/28/2016	Ruth V. Briggs	RM	drafted discovery responses; document review	2.00
6/29/2016	Ruth V. Briggs	RM	drafted discovery responses; document review; i/c with client	5.00
6/30/2016	Ruth V. Briggs	RM	document review; drafted discovery responses; emails with client	3.00
7/1/2016	Ruth V. Briggs	RM	drafted discovery responses; Telephone conference with client; email with client	3.00
7/7/2016	Ruth V. Briggs	RM	emails with OC; Telephone conference with client	0.50
7/11/2016	Ruth V. Briggs	RM	emails with client; prep for deps; document review; produced documents to opposing counsel	2.00
7/12/2016	Ruth V. Briggs	RM	prep for deps; emails with opposing counsel	4.00
7/13/2016	Ruth V. Briggs	RM	prep for deps; i/c with client; Telephone conference with opposing counsel	5.00
7/18/2016	Ruth V. Briggs	RM	Telephone conference with client; RV'd docs from defendant	1.00
7/18/2016	Ruth V. Briggs	RM	Telephone conference with client; RV'd docs from defendant	0.00
7/27/2016	Ruth V. Briggs	RM	emails with OC; Telephone conference with client; document review	2.00
8/4/2016	Ruth V. Briggs	RM	emails with opposing counsel	0.20
8/8/2016	Ruth V. Briggs	RM	emails with OC; revised joint motion draft	0.40
8/17/2016	Ruth V. Briggs	RM	Telephone conference with OC	0.50
11/29/2016	Ruth V. Briggs	RM	emails with opposing counsel and client	0.20
12/12/2016	Ruth V. Briggs	RM	Telephone conference with client; document review	1.00
12/14/2016	Ruth V. Briggs	RM	document review	1.00
12/15/2016	Ruth V. Briggs	RM	document review; prep for depositions	3.00
1/10/2017	Ruth V. Briggs	RM	emails with OC	0.20
3/1/2017	Ruth V. Briggs	RM	file review; email with OC	0.50
3/3/2017	Ruth V. Briggs	RM	Telephone conference with client; emails with OC	0.60
3/8/2017	Ruth V. Briggs	RM	emails with OC	0.20
3/9/2017	Ruth V. Briggs	RM	Telephone conference with OC; Telephone conference with client; email with OC	1.00
3/14/2017	Ruth V. Briggs	RM	emails with OC; emails with client	1.00
3/15/2017	Ruth V. Briggs	RM	Telephone conference with client	0.30
3/16/2017	Ruth V. Briggs	RM	Telephone conference and emails with OC	1.00
3/17/2017	Ruth V. Briggs	RM	Telephone conference and emails with OC	0.50
3/28/2017	Ruth V. Briggs	RM	Telephone conference and emails with OC; Telephone conference with client	0.50
3/30/2017	Ruth V. Briggs	RM	emails with OC; Telephone conference with client	0.50
4/13/2017	Ruth V. Briggs	RM	document review	0.50
5/1/2017	Ruth V. Briggs	RM	emails with client	0.20
5/21/2017	Ruth V. Briggs	RM	prep for depositions	4.00
5/22/2017	Ruth V. Briggs	RM	Internal conference with client; prep for deps	4.50
5/25/2017	Ruth V. Briggs	RM	dep prep with client; deposition of plaintiff; i/c with client	11.00
5/26/2017	Ruth V. Briggs	RM	email with client and email with OC	0.20
5/29/2017	Ruth V. Briggs	RM	prep for depositions	4.00
5/30/2017	Ruth V. Briggs	RM	dep prep; Telephone conference with client; Telephone conference with OC	6.00
5/31/2017	Ruth V. Briggs	RM	dep of Wu and dep preparation	4.00
6/22/2017	Ruth V. Briggs	RM	Telephone conference and emails with client; drafted supplemental discovery responses	1.00
6/23/2017	Ruth V. Briggs	RM	Telephone conference and emails with client; prep for depositions	3.50
6/27/2017	Ruth V. Briggs	RM	prep for deps of Temple witnesses	7.00
6/28/2017	Ruth V. Briggs	RM	prep for deps of Temple witnesses	8.00
6/29/2017	Ruth V. Briggs	RM	Wacker dep; prep for Wacker deposition	8.00
6/30/2017	Ruth V. Briggs	RM	prep for deps; dep of Walton; dep of Foehl	8.00
7/10/2017	Ruth V. Briggs	RM	Telephone conference with client; email with OC	0.50
7/12/2017	Ruth V. Briggs	RM	document review; drafted letter to OC	2.00
7/17/2017	Ruth V. Briggs	RM	review medical notes; Telephone conference with client	1.50
7/21/2017	Ruth V. Briggs	RM	i/c with client; deposition of client	4.00
7/31/2017	Ruth V. Briggs	RM	drafted SJ response	2.00
8/1/2017	Ruth V. Briggs	RM	drafted response to SJ motion	6.00
8/2/2017	Ruth V. Briggs	RM	drafted summary judgment response	6.00
8/3/2017	Ruth V. Briggs	RM	email with client; drafted summary judgment response	8.00
8/6/2017	Ruth V. Briggs	RM	drafted summary judgment response	8.00
8/7/2017	Ruth V. Briggs	RM	drafted summary judgment response	10.00
8/21/2017	Ruth V. Briggs	RM	reviewed Defendant's reply motion; email with client	0.50
1/3/2018	Ruth V. Briggs	RM	i/c with Steve Console; Telephone conference with client	0.50
2/9/2018	Ruth V. Briggs	RM	Telephone conference with court; Telephone conference with client; emails with OC	0.50
3/5/2018	Ruth V. Briggs	RM	i/c with client; Telephone conference with Steve Console	2.00
3/6/2018	Ruth V. Briggs	RM	Telephone conference with SGJ; email to OC; prep for settlement conference	0.50
3/14/2018	Ruth V. Briggs	RM	drafted settlement memo; email with court	3.00
3/22/2018	Ruth V. Briggs	RM	prep for settlement conference and conference	4.00
4/30/2018	Ruth V. Briggs	RM	emails with OC; Telephone conference with deputy clerk of court; prep for trial	0.50

6/18/2018	Ruth V. Briggs	RM	Telephone conference with court; Telephone conference with client	1.00
6/19/2018	Ruth V. Briggs	RM	Telephone conference with client; prep for trial	3.00
6/29/2018	Ruth V. Briggs	RM	emails with client; prep for trial	2.50
7/5/2018	Ruth V. Briggs	RM	trial prep	5.00
7/6/2018	Ruth V. Briggs	RM	i/c with client; trial prep	8.00
7/7/2018	Ruth V. Briggs	RM	trial prep	8.00
7/8/2018	Ruth V. Briggs	RM	trial prep	5.00
7/9/2018	Ruth V. Briggs	RM	trial prep	10.00
7/10/2018	Ruth V. Briggs	RM	trial prep	10.00
7/11/2018	Ruth V. Briggs	RM	trial prep	10.00
7/12/2018	Ruth V. Briggs	RM	trial prep	10.00
7/13/2018	Ruth V. Briggs	RM	trial prep	8.00
7/14/2018	Ruth V. Briggs	RM	trial prep	10.00
7/15/2018	Ruth V. Briggs	RM	trial prep	10.00
7/16/2018	Ruth V. Briggs	RM	trial and trial prep	12.00
7/17/2018	Ruth V. Briggs	RM	trial and trial prep	12.00
7/18/2018	Ruth V. Briggs	RM	trial and trial prep	12.00
7/19/2018	Ruth V. Briggs	RM	trial and trial prep	7.00
7/23/2018	Ruth V. Briggs	RM	Telephone conference with client; emails with client; i/c with SGC; drafted Rule 59 motion	1.50
7/24/2018	Ruth V. Briggs	RM	emails with OC, Steve Console and Laura Mattiacci; Legal Research on front pay brief; Telephone conference with client	4.00
7/25/2018	Ruth V. Briggs	RM	Telephone conference and emails with opposing counsel and court; Legal Research on front pay and attorneys' fees	3.00
7/26/2018	Ruth V. Briggs	RM	Telephone conference and emails with client; emails with Laura Mattiacci and Steve Console	0.50
7/30/2018	Ruth V. Briggs	RM	drafted post-trial brief and legal research	4.00
7/31/2018	Ruth V. Briggs	RM	drafted post-trial brief; Legal Research on brief	2.00
8/2/2018	Ruth V. Briggs	RM	drafted brief; Legal Research on damages	5.00
8/7/2018	Ruth V. Briggs	RM	drafted post-trial brief and legal research	4.00
8/8/2018	Ruth V. Briggs	RM	drafted post-trial brief and legal research	8.00
8/9/2018	Ruth V. Briggs	RM	drafted post-trial brief and legal research	8.00
8/10/2018	Ruth V. Briggs	RM	drafted post trial brief and Legal Research; Telephone conference with Steve Console; emails with Laura Mattiacci; reviewed Defendant's post-trial brief	6.00
8/13/2018	Ruth V. Briggs	RM	review defendant's post-trial brief; Legal Research on brief response	4.00
8/14/2018	Ruth V. Briggs	RM	drafted post-trial brief; Telephone conference with client	4.00
8/15/2018	Ruth V. Briggs	RM	drafted post-trial brief	5.00
8/16/2018	Ruth V. Briggs	RM	drafted post-trial brief	5.00
8/17/2018	Ruth V. Briggs	RM	Telephone conference with client; Legal Research on post-trial brief	2.00
8/20/2018	Ruth V. Briggs	RM	Telephone conference with client; drafted post trial brief response	6.00
8/21/2018	Ruth V. Briggs	RM	Telephone conference with client; drafted post trial brief response	6.50
8/23/2018	Ruth V. Briggs	RM	drafted post trial motion response	14.00
8/24/2018	Ruth V. Briggs	RM	drafted post trial motion response; reviewed Defendant's post trial motion response; Telephone conference with client	4.00
8/27/2018	Ruth V. Briggs	RM	review Defendant's motion response; drafted motion reply; Telephone conference and emails with client	3.50
10/16/2018	Ruth V. Briggs	RM	review court opinion on post-trial motions; Telephone conference with client; internal conference with Steve Console	1.50
10/17/2018	Ruth V. Briggs	RM	Telephone conference with OC; research and drafted motion for attorney fees	3.00
10/18/2018	Ruth V. Briggs	RM	legal research and drafted motion for attorneys' fees	4.00
10/19/2018	Ruth V. Briggs	RM	legal research and drafted motion for attorneys' fees	3.00
10/22/2018	Ruth V. Briggs	RM	legal research and drafted motion for attorneys' fees	5.00
10/24/2018	Ruth V. Briggs	RM	legal research and drafted motion for attorneys' fees	3.00
10/25/2018	Ruth V. Briggs	RM	legal research and drafted motion for attorneys' fees	4.00

Total Hours for Rahul Munshi 485.40

Stephen G. Console				
7/28/2016	Ruth V. Briggs	SGC	voice mail to Rahul Munshi, Esquire; phone call with Rahul Munshi, Esquire	0.10
2/20/2017	Ruth V. Briggs	SGC	Internal conference with Rahul Munshi, Esquire	0.10
1/3/2018	Ruth V. Briggs	SGC	Internal conference with Rahul Munshi, Esquire	0.20
1/12/2018	Ruth V. Briggs	SGC	E-mails to/from opposing counsel and attorneys	0.20
1/19/2018	Ruth V. Briggs	SGC	File review; internal conference with Rahul Munshi, Esquire	0.20
2/5/2018	Ruth V. Briggs	SGC	Telephone conference with opposing counsel	0.20
3/5/2018	Ruth V. Briggs	SGC	Internal conference with Rahul Munshi, Esquire	1.00
3/22/2018	Ruth V. Briggs	SGC	Prepare for and attend settlement conference; telephone conference with opposing counsel	3.00
3/23/2018	Ruth V. Briggs	SGC	File review; internal conference with attorneys	0.40
4/2/2018	Ruth V. Briggs	SGC	Texts to/from opposing counsel; internal conference with Rahul Munshi, Esquire	0.50
4/3/2018	Ruth V. Briggs	SGC	Telephone conference with opposing counsel	0.60
6/21/2018	Ruth V. Briggs	SGC	Internal conference with Laura C. Mattiacci, Esquire; internal conference with Rahul Munshi, Esquire	0.50
7/8/2018	Ruth V. Briggs	SGC	Telephone conference with Laura C. Mattiacci, Esquire	1.00
7/10/2018	Ruth V. Briggs	SGC	Telephone conference with Laura C. Mattiacci, Esquire	0.50
7/12/2018	Ruth V. Briggs	SGC	Internal conference with Laura C. Mattiacci, Esquire	0.50
7/16/2018	Ruth V. Briggs	SGC	Internal conferences with Laura C. Mattiacci, Esquire; jury selection; internal conference with Rahul Munshi, Esquire	3.50
7/17/2018	Craig Briggs	SGC	E-mails/texts to/from Laura C. Mattiacci, Esquire; telephone conference with Laura C. Mattiacci, Esquire	1.50
7/18/2018	Ruth V. Briggs	SGC	Internal conference with Rahul Munshi, Esquire; internal conference with Laura C. Mattiacci, Esquire	1.00
7/23/2018	Ruth V. Briggs	SGC	Internal conference with Rahul Munshi, Esquire; telephone conference with Laura C. Mattiacci, Esquire; e-mails to/from attorneys	1.20
7/27/2018	Ruth V. Briggs	SGC	Telephone conference with Laura C. Mattiacci, Esquire	0.20
7/30/2018	Ruth V. Briggs	SGC	Internal conference with Laura C. Mattiacci, Esquire	1.00
8/10/2018	Ruth V. Briggs	SGC	Review and revise motion; e-mails to/from Rahul Munshi, Esquire; telephone conference with Rahul Munshi, Esquire	1.20
8/28/2018	Ruth V. Briggs	SGC	Internal conference with Rahul Munshi, Esquire; review motion/brief	0.60
Total Hours for Stephen G. Console				19.20

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

RUTH BRIGGS,

Plaintiff,

v.

TEMPLE UNIVERSITY

Defendant.

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CIVIL ACTION NO.
16-cv-0248

**DECLARATION OF STEPHEN G. CONSOLE IN SUPPORT
OF PLAINTIFF'S PETITION FOR ATTORNEYS' FEES AND COSTS**

I, Stephen G. Console, make the following Declaration in support of Plaintiff Ruth Briggs's Motion for Attorneys' Fees and Costs in the above-captioned matter.

1. I make this Declaration upon my personal knowledge and a review of the file in this case.
2. I am the founder and a member of Console Mattiacci Law, LLC ("CML") – formerly known as Console Law Offices LLC - and I am authorized to make this Declaration.
3. I am a graduate of Drew University (B.A. 1979) and Villanova Law School (J.D. 1982).
4. I have been admitted to practice law in Pennsylvania since 1982 and in New Jersey since 1983, and am admitted to practice before the following federal courts: the United States District Court for the Eastern District of Pennsylvania; the United States District Court for the Middle District of Pennsylvania; the United States District Court for the District of New Jersey; and the United States Court of Appeals for the Third Circuit.
5. Since 1985, I have concentrated my practice on employment law, and have handled thousands of employment law cases as counsel for the employee.
6. I am an elected fellow of the College of Labor and Employment Lawyers (2008).

7. Martindale-Hubbell has recognized me as an “AV Rated” Attorney – the highest possible peer review rating in legal ability and ethical standards.

8. From 1988 through 2000, I was a member of the Executive Board of Directors of the National Employment Lawyers Association of New Jersey.

9. I regularly speak at seminars involving employment law and have done so for more than twenty-five (25) years.

10. I have been recognized by my peers as a top practitioner. Without limitation: I was named as a leading attorney in the state of Pennsylvania in the area of plaintiff’s employment and labor law in *Chambers USA: America’s Leading Business Lawyers 2005-2006*, as one of the Best Lawyers in America (2008-2014) in the area of Labor and Employment Law in *Best Lawyers in America*, as one of the Best Lawyers in *The Best of the U.S.* (2008-2013), and as one of the Best Lawyers in America in *America’s Who’s Who*. I was named the Best Lawyers’ 2012 Philadelphia Employment Law – Individuals Lawyer of the Year. I was named to the “Top 100 Attorneys in Philadelphia” and “Top 100 Attorneys in Pennsylvania” by *Philadelphia Magazine* and *Philadelphia Super Lawyers Magazine* from 2008-present.

11. I established CML in 1990. For more than 28 years, the firm has specialized in representing non-union employees in all aspects of workplace matters, including discrimination and retaliation cases. The firm is included among the Martindale-Hubbell Bar Register of Preeminent Lawyers, which is exclusive to AV Preeminent Attorneys – those who have achieved the highest possible peer review rating in both legal ability and ethical standards.

12. CML is highly selective of the cases accepted by the firm. At present, CML represents only a small fraction of the clients who contact our firm for representation.

13. CML is dedicated to providing outstanding representation to its clients. The firm's current legal staff is made up of thirteen attorneys and eight paralegals/legal assistants. Work is allocated in a way so as to ensure excellent representation in an efficient manner.

14. I oversee each case and offer input especially into its initial assessment, trial strategy and settlement negotiations. Each case is staffed with an attorney to handle it on a day to day basis through resolution; the level of experience of the attorney assigned depends on several factors, including the complexity of the case. If it is necessary to try a case in court or in arbitration, the firm devotes great resources to what is considered in today's legal world to be an unusual event requiring unique talents and specialized skills. If warranted, the case will be tried by firm member Laura C. Mattiacci, the firm's designated lead trial counsel for many cases. Throughout the representation, attorneys and law clerks are often called upon to research issues; paralegals and legal assistants perform vital tasks such as communicating with the administrative agency, keeping and organizing the file, and helping prepare the visual presentation at trial.

15. CML's case staffing according to particular skills *works*. The firm has achieved a high level of success and a great demand for its services. In my many years of experience, I have found that this method of staffing is necessary to advocate for clients at the highest level and achieve the reputation and success that our firm has. I believe that it has enabled our firm to take on and commit to litigating to verdict against resource-rich defendants cases that many plaintiff's lawyers cannot.

16. I allocated the work on this case to ensure the excellent representation of Plaintiff in an efficient way.

17. From the outset of this matter through post-trial motions, I performed 19.2 hours of work on this case for which Plaintiff seeks reimbursement. I kept abreast of and oversaw Plaintiff's

case through litigation. Among other things, I attended the settlement conference with the court, communicated on occasion with opposing counsel, formulated a settlement demand, reviewed important correspondence and filings, attended jury selection, and communicated and strategized with Ms. Mattiacci and Mr. Munshi throughout the representation.

18. Mr. Munshi was the primary attorney working on this case from May 2014 through trial and the post-trial actions, including the Post-Trial briefing. He is an experienced and excellent litigator who vigorously prosecuted Plaintiff's claims through litigation. Among other things, Mr. Munshi conducted comprehensive discovery and developed the extensive and varied facts necessary to demonstrate pretext in this case. Mr. Munshi deposed witnesses produced by Defendant, including Human Resources professionals and the decision-makers in this action. Defendant produced over 1,000 pages of documents, including emails, all of which he reviewed. He also reviewed and produced over 1,000 documents from Plaintiff, including extensive documentation on Plaintiff's job search post-employment with Defendant and her medical records. Mr. Munshi also successfully defeated Defendant's Motion for Summary Judgment, and provided valuable assistance in the successful trial of Plaintiff's case.

19. Ms. Mattiacci focused intensively on the trial of Plaintiff's case. She is an experienced and excellent trial lawyer whose superior skills and successes have commanded the attention and respect of the defense bar. Ms. Mattiacci mastered the varied and many facts of this case, worked extensively on trial preparation, and presented the evidence to the jury in a way that was easy to grasp and which allowed them to see through Defendant's many levels of cover-up to hide the discriminatory animus at play in Plaintiff's termination.

20. The itemized entries for myself, Mr. Munshi, and Ms. Mattiacci are set forth in Exhibit 1. Valuable contributions were also made by legal assistants whose time has not been recorded. Among other things, they helped maintain the file and assisted in the visual presentations at trial.

21. It was the policy of CML for its attorneys to keep contemporaneous records of time spent on behalf of clients of the firm. CML has exercised billing judgment by deleting some entries so that Exhibit 1 reflects only the time for which Plaintiff seeks reimbursement. Where the billing entries reflect an overlap of attorney time, that is reflective of a collaborative effort. I have reviewed the itemized entries for my time as reflected in Exhibit 1 and they are accurate.

22. From the inception of this case through October 25, 2018, CML performed 735.9 hours of services for which reimbursement is sought, resulting in a lodestar amount of \$405,099.00. The rates used in the calculation of the lodestar are the firm's actual rates and they have been updated to currently used rates. Hours worked and rates for services performed are summarized below:

Name	Year began as professional/ paraprofessional	Hours Worked	Hourly Rate	Lodestar Amount
Stephen G. Console, Principal	1982	19.2	\$940	\$18,048.00
Laura C. Mattiacci, Member	2002	231.3	\$750	\$173,475.00
Rahul Munshi, Associate	2009	485.4	\$440	\$213,576.00
Total		735.9		\$405,099.00

23. In my professional opinion, all of the work performed by CML was reasonable and necessary to the successful prosecution of this case and the favorable verdict reached.

24. The hourly rates for the attorneys as reflected in the billing entries (Exhibit 1 to the Petition) and summarized in the above chart are the same as the regular rates charged for their services at that time in non-contingent matters.

25. CML represented Ms. Briggs on a straight contingency fee arrangement, with Ms. Briggs not having to pay any money to the firm as the case proceeded. I was aware that Ms. Briggs would not be able to litigate this case with counsel if she had to pay even a small fraction of our fees as they accrued.

26. The usual and customary hourly rates used in the calculation of CML's lodestar are the actual rates CML has used to bill the clients it represents on an hourly fee basis, and which have been paid by hourly clients. In fact, CML bills about \$500,000 annually on an hourly fee basis at its usual and customary rates.

27. CML's usual and customary rates have been approved by arbitrators and courts in awarding fees to our firm.

In 2014, CML submitted a fee petition in the matter of *Sessions v. Owens-Illinois, Inc.*, a class action pension benefits case in the United States District Court for the Middle District of Pennsylvania (C.A. No. 1:07-cv-1669). The fee petition for a negotiated portion of the common fund set forth a lodestar check based on CML's usual and customary rates and referenced in particular my work and billing rate. By Order dated October 23, 2014 (Docket No. 283), the Honorable Robert Mariani approved the requested fee based, in part, upon a cross check of the percentage of recovery based fee against the lodestar method.

In 2008, CML submitted declarations setting forth its usual and customary rates in support of plaintiffs' petition for attorneys' fees and costs in a race discrimination case. Chief United States Magistrate Judge Rueter awarded the attorneys' fees and found that the CML's

rates (including for myself) were “reasonable billing rates for federal employment-related matters” in the Philadelphia area and in accordance with the prevailing market rates. *See Marthers v. Gonzalez*, Civil Action No. 05-cv-3778, Docket No. 81 (E.D. Pa. August 13, 2008).

In 2007, an arbitrator awarded fees to CML as the prevailing party on a multi-claimant WPCL and ERISA case based on CML’s usual and customary rates charged to its clients. (*Aaron, et al. v. ACE.*) Defendant's counsel did not contest the reasonableness of CML's hourly rates. In 2005, an arbitrator awarded CML its attorney’s fees based on its usual and customary hourly rates. (*Bolton v. LINA.*) In that case, defendant's counsel did not contest the reasonableness of CML’s hourly rates.

In 1999, CML submitted a fee petition in the matter of *Feret v. First Union Corp.* based on its usual and customary hourly rates. The petition was approved (although, as agreed, the award was in an amount negotiated as part of the aggregate class settlement). *See Feret v. First Union Corp.*, Civil Action No. 2:97-cv-06759, Docket No. 104 (E.D. Pa. August 16, 1999).

The Honorable Clarkson S. Fisher of the United States District Court for the District of New Jersey awarded attorney's fees based on CML’s usual and customary rates as the prevailing party at trial in an age discrimination case. *See Garden v. General Elec.*, Civil Action No. 3:91-cv-01204, Docket No. 55 (D.N.J. June 7, 1993). CML was also awarded attorneys’ fees as the prevailing party in discrimination cases based on its usual and customary rates in *Plumley v. Harbor Linen*, Civil Action No. 1:88-cv-01557 (D.N.J.) and *Bronstein v. Harbor Services*, Civil Action No. 1:88-cv-05074 (D.N.J.).

28. I am familiar with the rates charged by other attorneys with backgrounds similar to mine, as well as to the attorneys within CML who worked on this matter. Based on my personal knowledge, the rates that were utilized by CML in calculating its lodestar in this case are within

the prevailing market rates for similar work performed by attorneys of comparable skills and experience.

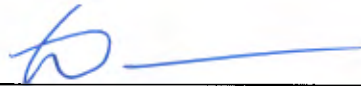
29. The costs and expenses incurred and paid by CML in connection with this case were reflected on the books and records of the firm. These books and records were prepared from checks and expense vouchers that were regularly maintained by the firm in the ordinary course of business and accurately reflect the costs and expenses incurred. A printout of the detailed, individualized billing entries is attached as Exhibit 10 to Plaintiff's Petition. CML has incurred \$6,042.36 in costs in pursuing this action on behalf of Plaintiff.

In my professional opinion, these costs were reasonably incurred in the prosecution of this litigation.

30. In my professional opinion, the attorneys' fees and costs requested by Plaintiff's Petition are fair, reasonable and fully consistent with the purpose of the fee-shifting provisions contained in anti-discrimination statutes, including the ADEA, Title VII, and PHRA.

I understand the foregoing Declaration is made subject to the penalties of 28 U.S.C. §1746 relating to unsworn falsification to authorities.

Dated: 10/29/18



Stephen G. Console, Esquire

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

RUTH BRIGGS,

Plaintiff,

v.

TEMPLE UNIVERSITY

Defendant.

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CIVIL ACTION NO.
16-cv-0248

**DECLARATION OF LAURA C. MATTIACCI IN SUPPORT
OF PLAINTIFF'S PETITION FOR ATTORNEYS' FEES AND COSTS**

I, Laura C. Mattiacci, make the following Declaration in support of Plaintiff Ruth Briggs's Motion for Attorneys' Fees and Costs in the above-captioned matter.

1. I make this Declaration upon my personal knowledge and a review of the file in this case.

2. I am a member of Console Mattiacci Law, LLC ("CML") and I am authorized to make this Declaration.

3. I am a graduate of Scranton University (B.A. 1999) and the Beasley School of Law at Temple University (J.D. 2002).

4. While at the Beasley School of Law, I clerked for the preeminent trial lawyer, James E. Beasley, Sr., and was a standout member of the National Trial Team, where I won several trial advocacy awards and honors, including the ATLA National Championship in Trial Advocacy.

5. I have been admitted to practice law in Pennsylvania and New Jersey since 2002, and am admitted to practice before the following federal courts: the United States District Court

for the Eastern District of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Court for the District of New Jersey.

6. I joined CML – formerly known as Console Law Offices - as an associate attorney in 2003 and have since devoted my practice to the representation of employees. I have represented employees in all matters of plaintiffs' employment law, from counseling, representation at the administrative agency, negotiation of settlements, litigation in state and federal courts, and at trial.

7. In 2012, I was made a shareholder and partner of CML, and designated as the firm's lead trial counsel on its significant cases.

8. At CML, I have tried numerous jury trials. Two settled several days into trial. Eight were tried to verdict (six of which were favorable). I have prepared many other cases for trial, which were settled right after or shortly before jury selection. In 2013, I was lead trial counsel in the case of *Pietrowski v. The Kintock Group* (Philadelphia Court of Common Pleas, C.A. No. 111003328), which resulted in the largest employment law verdict in Pennsylvania, as reported in *The Legal Intelligencer*. In 2017, I was lead trial counsel in the case of *Williams v. The MLB Network* (N.J. Superior Court, No. CAM-L-3675-14) which resulted in a jury verdict of over \$1.5 million.

9. I have spoken frequently at seminars and conferences. In 2016, I was asked to speak as part of a distinguished panel that included federal judges from around the nation regarding the December 1, 2015, Amendments to the Federal Rules of Civil Procedure. I have spoken frequently on the topic of employment law, including in particular on the trial of an employment case. Among my recent speaking engagements were: *Employment Law Essentials and Best Practices: Preparing for Trial* (Employment Law Institute, 2015); *How to Get*

Through (and Win) the First Day of Trial (Pennsylvania Bar Institute, 2015); *Employment Law Essentials and Best Practices: Disability Discrimination and FMLA* (Employment Law Institute, 2015); *Trial Techniques and Strategies for Litigating Damages* (ABA, 2018); *Strategic Trial Decisions: Perspectives from Counsel and the Court* (Employment Law Institute, 2018); *Workers with Disabilities and the Rise of Retaliation Claims* (ABA, 2018); and *Representation Services in the Courts for Deaf and Hard of Hearing Individuals* (Pennsylvania Bar Association, 2018).

10. I have written many articles on the topic of employment law, including several that focus on the trial of an employment case. Among my recent publications are: *Trial of an Employment Law Case – Mock Demonstration of Closing, Directs and Crosses* (Pennsylvania Bar Institute, 2014); *Top Ten Pitfalls for Employment Lawyers* (Employment law Institute, 2012); and *Visualizing Your Evidence* (National NELA Conference, 2012).

11. I have been recognized by my peers as a top practitioner. Without limitation: I was recognized in *Best Lawyers in America* in the area of Employment Law (2015-2019) and by *Lawdragon 500 Plaintiff Employment Lawyers Guide* (2018); and I have been named to the list of “Top 50 Female Attorneys in Pennsylvania” by *Philadelphia Magazine* and *Philadelphia Super Lawyers Magazine* 2014-2018, and to their list of “Top 100 Attorneys in Philadelphia” and “Top 100 Attorneys in Pennsylvania” in 2015 and 2018. I have been named to the Pennsylvania “Super Lawyers” list by *Philadelphia Magazine* and *Philadelphia Super Lawyers Magazine* every year since 2013. I was named to the “2011 Lawyers on the Fast Track” by *The Legal Intelligencer*, a distinction given to only 27 lawyers under the age of 40.

12. I worked on Plaintiff’s case as CML’s lead trial counsel. In that role, I generally keep abreast of cases in the administrative agency that are likely headed into litigation, including

this one. I worked with our firm's paralegals to ensure that the file in this case was in order in the event of litigation. However, in order to dedicate sufficient time to prepare for trial in all of the firm's significant cases, I generally do not actively participate in the discovery, deposition taking and motion practice of the firm's cases. When the complaint was filed in this case, I communicated with Stephen Console and Rahul Munshi regarding status and strategy, but did not take any depositions or actively participate in discovery as I was focused on the firm's other trial work. When it became clear that this case was heading for trial (in or around June 2018), I devoted great attention to it. I had to master the facts, and spent significant time reviewing the documents, reading the deposition transcripts, and other key filings such as the summary judgment motions. As trial approached, I prepared intensively. Among other things, I prepared closing arguments, cross-examinations of witnesses, worked on pre-trial and trial submissions, and worked extensively on the overall presentation of the evidence to the jury.

13. This case was one that presented particular challenges to prevailing at trial. As with every discrimination case, it is difficult to prove intent. An ADEA claim is particularly challenging as a plaintiff must prove that age was the determinative factor in the adverse action. Further, demonstrating pretext in an employment matter is especially daunting as it requires the presentation of varied and extensive facts to the jury in a way that is easy to grasp. Further adding to the challenges of this case was the large and sophisticated Defendant; the amount of documentation; and, the many levels of cover-up employed by Defendant to hide the discriminatory and retaliatory animus at play.

14. I devoted the time and attention to the preparation and presentation of this case at trial as I believed in my experience and professional opinion to be necessary to win.

15. From the outset of litigation through October 25, 2018, I performed 231.30 hours of work on this case for which Plaintiff seeks reimbursement. In summary and without limitation, I:

- kept abreast of the case through communications with Rahul Munshi and Stephen Console;
- reviewed the “trial binder,” which included the key information in summary form prepared in anticipation of trial;
- worked closely with our paralegals regarding necessary preparations for trial;
- reviewed the summary judgment filings, including exhibits;
- reviewed and organized the documents produced by the parties in the case;
- read the deposition transcripts;
- reviewed the “hot” documents in the case;
- communicated with opposing counsel regarding trial matters;
- digested the deposition transcripts;
- reviewed, organized, and analyzed documents;
- reviewed and analyzed Defendant’s trial exhibit list;
- reviewed and analyzed Defendant’s trial exhibits;
- participated in strategy meetings with the trial team;
- created the trial strategy for the case;
- prepared cross-examination of witnesses;
- organized and analyzed Plaintiff’s trial exhibits;
- prepared closing argument;
- worked on Plaintiff’s motion in limine;
- reviewed and analyzed Defendant’s motions in limine;
- worked on voir dire and verdict forms;
- conducted legal research regarding evidentiary issues;
- conducted legal research on jury instructions;
- reviewed Court’s summary judgment opinion;
- conducted legal research regarding verdict sheet;
- worked on final preparations for trial;
- handled evidentiary issues at trial; and
- tried the four day jury trial as lead trial counsel to successful verdict.

16. In accordance with CML’s policy, I recorded on a contemporaneous basis the time I spent working on Plaintiff’s case. I have reviewed the itemized entries for my time on this case as reflected on Exhibit 1 to Plaintiff’s Motion and they are accurate.

I understand the foregoing Declaration is made subject to the penalties of 28 U.S.C. §1746 relating to unsworn falsification to authorities.

Dated: 10/29/18



Laura C. Mattiacci, Esquire

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

RUTH BRIGGS,

Plaintiff,

v.

TEMPLE UNIVERSITY

Defendant.

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**CIVIL ACTION NO.
16-cv-0248**

**DECLARATION OF RAHUL MUNSHI IN SUPPORT OF
PLAINTIFF'S PETITION FOR ATTORNEYS' FEES AND COSTS**

I, Rahul Munshi, make the following Declaration in support of Plaintiff Ruth Briggs's Motion for Attorneys' Fees and Costs in the above-captioned matter.

1. I make this Declaration upon my personal knowledge and a review of the file in this case.
2. I am a partner at Console Mattiacci Law, LLC ("CML") – formerly known as Console Law Offices LLC - and I am authorized to make this Declaration.
3. I am a graduate of Haverford College (B.A. 2006) and the Beasley School of Law at Temple University (J.D. 2009).
4. While at the Beasley School of Law at Temple University, I was a standout member of the National Trial Team, Jessup International Law Moot Court Team, and served as Managing Editor of the *Temple Political & Civil Rights Law Review*.
5. I have practiced law since 2009, and my first position out of law school was serving as a judicial law clerk for the Hon. Joel H. Slomsky of the United States District Court for the Eastern District of Pennsylvania (2009-2010).

6. Since joining CML in 2010, I have devoted my practice to the representation of employees. I have since that time represented employees in all matters of employment law, from counseling, representation at the administrative agency, negotiation of settlements, litigation in state and federal courts, and at trial. In 2017, I was elevated to partner at the firm.

7. In 2017, I served as trial counsel in *Braden v. Lockheed Martin Corporation* (D.N.J., Civil Action No. 14-4215) and obtained a jury verdict of \$51,560,000.00 in an age discrimination action. As trial counsel in that matter, I presented arguments, examined witnesses, and contributed to plaintiff's successful prosecution of the age discrimination action.

8. Also in 2017, I served as second-chair (with Laura C. Mattiacci, Esquire as first-chair) in *Williams v. The MLB Network* (N.J. Superior Court, No. CAM-L-3675-14), where we obtained a jury verdict in favor of the plaintiff for over \$1.5 million. In that litigation, I was the primary attorney handling pre-trial matters, including through discovery and motions practice.

9. In 2016, I served as lead counsel in a AAA Arbitration which resulted in an award for the plaintiff against a Fortune 50 defendant in an age discrimination and retaliation matter. As lead counsel in that matter, I presented all arguments, examined every witness, and led all facets of plaintiff's successful prosecution of the action.

10. Additionally, in 2016, I successfully argued before the Court of Appeals for the Third Circuit in *McClain v. Avis* (Case No. 15-1936), where we obtained reversal of summary judgment in a race discrimination action.

11. In 2013, I served as co-counsel in the case of *Pietrowski v. The Kintock Group* (Philadelphia Court of Common Pleas, C.A. No. 111003328), which resulted in a jury verdict of \$1,678,000.00 - the largest employment law verdict in Pennsylvania for that year, as reported in *The Legal Intelligencer*. At the *Pietrowski* trial, I presented plaintiff's opening statement and

conducted several trial examinations, including the direct examination of the plaintiff. Laura C. Mattiacci served as first-chair in the *Pietrowski* matter.

12. I have spoken frequently at seminars and conferences on employment law and litigation. In 2013, I served as an instructor at the Pennsylvania Bar Institute (PBI) Employment Law Institute on a panel regarding evidence in age discrimination actions. In 2014, I served as an instructor at the PBI Employment Law Institute on a seminar called “Trial of a Retaliation Case,” where I represented a fictional plaintiff in a mock trial before several hundred seminar participants. In 2015, I served as a panelist and moderator at the Philadelphia Bar Association’s Bench-Bar and Annual Conference, where I led a discussion on LGBT discrimination in the workplace. In 2016, I served as an instructor at the PBI Employment Law Institute on a course regarding age discrimination litigation. In 2017, I again served as an instructor at the PBI Employment Law Institute on a seminar regarding employee protections under the Americans with Disabilities Act. Thus far in 2018, I have co-presented a CLE hosted by the ABA on litigation skills and tips for discovery in employment litigation actions; a CLE hosted by PBI called “Responding to Allegations of Sexual Misconduct”; and a CLE on issues surrounding the ADA and the FMLA, entitled “The Best Ways to Get Sued Over Employee Leaves and Accommodations.”

13. I have been recognized by my peers as a top practitioner. Without limitation: I have been named a “Rising Star” on the “Super Lawyers” list by *Philadelphia Magazine* and *Philadelphia Super Lawyers Magazine* every year since 2013; I was named to the “2016 Lawyers on the Fast Track” by *The Legal Intelligencer*, a distinction given to only 35 lawyers under the age of 40; and I was the 2012 recipient of the Young Alumni Award for Excellence in Leadership by Haverford College.

14. Over my nine plus years practicing law, I have represented hundreds of clients and have, under the supervision of Stephen G. Console and Laura C. Mattiacci, litigated through successful resolution scores of cases.

15. I had been the primary attorney working on this case from May 2014 through mid-2018, and continue to take a primary role in post-trial motions practice. At the trial in this matter, I assisted Laura C. Mattiacci in successfully prosecuting the case, delivered the opening statement on behalf of our client, and conducted the direct examination of Plaintiff. I also argued several pre-trial and mid-trial motions before the Court.

16. This case has been challenging and vigorously prosecuted. As with every discrimination and/or retaliation case, it is difficult to prove intent. An ADEA claim is particularly challenging as a plaintiff must prove that age was the determinative factor in the adverse action. Further, demonstrating pretext requires extensive factual investigation and discovery.

17. I deposed four (4) witnesses produced by Defendant and defended Plaintiff's deposition. Defendant produced over 1,000 pages of documents, including emails, all of which I reviewed. I also reviewed and produced approximately 800 documents from Plaintiff, including extensive documentation on her job search post-employment with Defendant and her medical records.

18. I devoted the time and attention to the development and prosecution of Plaintiff's case as I believed in my experience and professional opinion to be necessary to achieve its successful result.

19. From May 14, 2014, through October 25, 2018, I performed 485.4 hours of work on this case for which Plaintiff seeks reimbursement. In summary and without limitation, I:

- Initially consulted with Plaintiff after her termination of employment and reviewed Plaintiff's documents;

- Drafted and filed an Amended EEOC Charge on behalf of Plaintiff;
- Reviewed Defendant's position statements in this matter and submitted a rebuttal to the EEOC;
- Drafted and filed the complaint initiating the instant action with the Court;
- Drafted comprehensive discovery requests addressed to Defendant;
- Reviewed the documents produced by Defendant, which numbered approximately 1,000 pages of documents, including emails;
- Prepared Plaintiff's responses to Defendant's discovery requests;
- Prepared for and defended Plaintiff's deposition;
- Prepared for and deposed four (4) witnesses from Defendant;
- Drafted deposition summaries;
- Communicated with Plaintiff on a regular basis throughout the representation;
- Communicated with opposing counsel regarding all matters, including discovery disputes;
- Successfully responded to, and conducted legal research in opposition to, Defendant's Motion for Summary Judgment;
- Prepared for, and participated in, conferences with the Court;
- Helped prepare Plaintiff for her trial testimony;
- Strategized with Stephen G. Console and Laura C. Mattiacci;
- Reviewed Defendant's trial exhibit list and exhibits;
- Prepared and conducted direct examination of Plaintiff at trial;
- Prepared and presented Plaintiff's opening statement;
- Co-tried the four day trial to successful verdict; and

- Drafted the Post-Trial briefing.

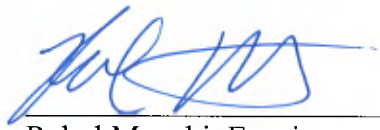
20. In accordance with CML's policy, I recorded on a contemporaneous basis the time I spent working on Plaintiff's case. I have reviewed the itemized entries for my time on this case as reflected on Exhibit 1 and they are accurate.

21. I have also reviewed the other entries on Exhibit 1 and I believe that they are accurate.

22. I have reviewed the costs and expenses reflected in Exhibit 10 to Plaintiff's Petition and summarized in the chart set forth in the Petition and I believe that they are accurate.

I understand the foregoing Declaration is made subject to the penalties of 28 U.S.C. §1746 relating to unsworn falsification to authorities.

Dated: 10/29/18



Rahul Munshi, Esquire

EXHIBIT 5

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

RUTH BRIGGS,

Plaintiff,

v.

TEMPLE UNIVERSITY

Defendant.

**CIVIL ACTION NO.
16-cv-0248**

DECLARATION OF SIDNEY L. GOLD, ESQUIRE

1. I, Sidney L. Gold, Esquire, make this declaration in support of the Motion of Plaintiff for an award of attorneys' fees and costs in the above-captioned matter.

2. I am a 1975 graduate of Temple University School of Law. I have been admitted to practice in Pennsylvania since 1975. I am also admitted to practice before the following federal courts: the United States District Court for the Eastern District of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Court for the District of New Jersey.

3. I am the principal shareholder of the Philadelphia law firm Sidney Gold & Associates, P.C., which has been recognized by the Martindale-Hubbell Bar Register as a preeminent law firm in the field of employment law and civil rights litigation.

4. My practice, as well as that of the law firm, is exclusively concentrated in the representation of both employees and employers in all aspects of employment related litigation.

5. I am aware of the credentials and skills of Stephen G. Console, Esquire, Laura C. Mattiacci, Esquire, and Rahul Munshi, Esquire having co-counseled cases with them and/or their law firm in the past and also having referred cases to them and their law firm.

6. I am aware that Mr. Console is the founder and has been a member in the firm of Console Mattiacci Law, LLC (previously called Console Law Offices LLC) in Philadelphia, PA since 1990. Since 1985, Mr. Console has concentrated his practice in all aspects of employment law, with a special focus on litigation. Mr. Console's background includes a multitude of significant cases that resulted in verdicts and appellate discussions favorable to his clients. He has handled approximately 3,000 employment law cases as counsel for the employee. In addition, he regularly speaks at seminars involving employment law and has done so for over twenty-five (25) years. Mr. Console's requested rate of \$940 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local

market for lawyers of his level of experience in this field.

7. I am aware that Ms. Mattiacci is a member in the firm of Console Mattiacci Law, LLC. I am aware that she has been in practice since 2002 focusing on employment litigation and that she has vast experience in representing clients in employment cases. I am aware that Ms. Mattiacci was the lead trial counsel on this case and that she has tried numerous jury trials on behalf of plaintiffs, most of which have resulted in verdicts for the plaintiffs. Ms. Mattiacci's requested rate of \$750 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced lead trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local market for lawyers on her level of experience in this field.

8. I am aware that Mr. Munshi is a partner with Console Mattiacci Law, LLC. I am also aware that he is a 2006 graduate of Haverford College, a 2009 graduate of The Beasley School of Law at Temple University, and that he joined Console Mattiacci Law, LLC in 2010 after completing a federal judicial clerkship with the Hon. Joel H. Slomsky of the District Court for the Eastern District of Pennsylvania. I am aware that he has significant experience in representing clients in employment cases and that he regularly speaks at seminars involving employment law. Mr. Munshi's requested rate of \$440 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by trial counsel with similar backgrounds, abilities and experience in this field, and is reasonable in light of the local market for lawyers of his level of experience in this field.

9. There is a substantial risk of taking a plaintiff's employment case on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiffs' lawyers cannot take on representation and devote the necessary time to be able to successfully litigate these cases to verdict against experienced defense counsel.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct to the best of my knowledge and information.

/s/ Sidney L. Gold
Sidney L. Gold, Esquire
Sidney L. Gold & Associates, P.C.
1835 Market Street, Ste. 515
Philadelphia, PA 19103

DATED: 10/25/18

EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

RUTH BRIGGS,

Plaintiff,

v.

TEMPLE UNIVERSITY

Defendant.

**CIVIL ACTION NO.
16-cv-0248**

DECLARATION OF ROBERT A. DAVITCH, ESQUIRE

1. I, Robert A. Davitch, Esquire, make this declaration in support the Motion of Plaintiff for an award of attorneys' fees and costs in the above-captioned matter.

2. I am a 1976 graduate of Temple University (now Beasley) School of Law. I have been admitted to practice in Pennsylvania since 1976. I am also admitted to practice before the United States District Court for the Eastern District of Pennsylvania, and the United States Court of Appeals for the Third Circuit.

3. I am a principal and the vice-president of Sidkoff, Pincus & Green, P.C. ("SPG"). The firm was originally founded in 1958 and is one of the oldest law firms of its size in Philadelphia.

4. SPG is regularly involved in trial and litigation matters in federal and state courts, as well as proceedings before administrative agencies, and in front of arbitrators and mediators. For many years, I have concentrated my practice in the areas of employment and civil rights litigation, as well as contractual disputes, whistleblower claims, and personal injury claims that involve serious or catastrophic injuries.

5. Through my work, I am aware of the rates charged by employment attorneys in the Philadelphia market.

6. I am personally aware of the credentials and skills of Stephen G. Console, Esquire, Laura C. Mattiacci, Esquire, and Rahul Munshi, Esquire, having co-counseled and worked in tandem with them on employment law cases.

7. I am aware that Mr. Console is the founder, and has been a shareholder of the firm of Console Mattiacci Law, LLC (previously called Console Law Offices LLC) in Philadelphia, PA since 1990. I am also aware that since 1985, Mr. Console has concentrated his practice in all aspects of employment law, with a special focus on employment litigation. I also know that Mr. Console's background and professional experience includes a multitude of significant cases that have resulted in verdicts and decisions favorable to his clients. I know that he has handled approximately 3,000 employment law cases as counsel for the employee. In addition, he regularly

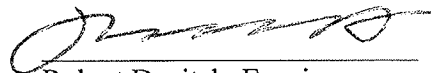
speaks at seminars involving employment law and has done so for over twenty-five (25) years. I am well aware of his stellar reputation in the relevant legal community. I have also worked with him as co-counsel in a number of cases and was able to personally observe his superior skills as an employment lawyer. Mr. Console's requested rate of \$940 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced trial counsel with similar backgrounds, abilities and experience in this field, and is reasonable in light of the local market for lawyers of his level of experience in this field.

8. I am aware that Ms. Mattiacci is a shareholder in the firm of Console Mattiacci Law, LLC. I am aware that she has been in practice since 2002 focusing on employment litigation and that she has vast experience in representing clients in employment cases. I am aware that Ms. Mattiacci was the lead trial counsel on this case and that she has tried many jury trials on behalf of plaintiffs, most of which have resulted in verdicts for the plaintiffs. I was co-trial counsel with Ms. Mattiacci in one employment case that was resolved after four (4) days of trial, and therefore got to see her in action first hand in that case, where she displayed her outstanding skills as an employment litigator. Ms. Mattiacci's requested rate of \$750 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced lead trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local market for lawyers on her level of experience in this field.

9. I am aware that Mr. Munshi is a partner with Console Mattiacci Law, LLC. I am also aware that he is a 2006 graduate of Haverford College, a 2009 graduate of The Beasley School of Law at Temple University, and that he joined Console Mattiacci Law, LLC in 2010 after completing a federal judicial clerkship with the Hon. Joel H. Slomsky of the United States District Court for the Eastern District of Pennsylvania. I am aware that he has significant experience in representing clients in employment cases and that he regularly speaks at seminars involving employment law. Mr. Munshi's requested rate of \$440 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by trial counsel with similar backgrounds, abilities and experience in this field, and is reasonable in light of the local market for lawyers of his level of experience in this field.

10. There is a substantial risk in taking a plaintiff's employment case on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiffs' lawyers will not take on representation or agree to devote the necessary time to be able to successfully litigate these cases to verdict against experienced defense counsel.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct to the best of my knowledge and information.



Robert Davitch, Esquire
Sidkoff, Pincus & Green, P.C.
2700 Aramark Tower
1101 Market Street
Philadelphia, PA 19107

DATED:

10/25/18

EXHIBIT 7

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

RUTH BRIGGS,

Plaintiff,

v.

TEMPLE UNIVERSITY

Defendant.

CIVIL ACTION NO.
16-cv-0248

DECLARATION OF MICHAEL HOMANS

1. I, Michael Homans, make this declaration in support of the Motion of Plaintiff for an award of attorneys' fees and costs in the above-captioned matter.

2. I am a 1995 graduate of the College of William & Mary School of Law. I have been admitted to practice in Pennsylvania since 1995. I also have been admitted to practice before the following federal courts: the United States Court of Appeals for the Third Circuit, the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the Western District of Pennsylvania, the United States District Court for the District of New Jersey, and the United States District Court for the Southern District of New York.

3. I am a founding partner of HomansPeck, a law firm based in Philadelphia focusing on labor and employment law and litigation. Before co-founding the firm in 2018, I practiced law for over twenty (20) years, concentrating on litigation of workplace disputes and advice to employers and employees. I previously worked in the Labor & Employment Group at Drinker Biddle & Reath in Philadelphia, and was Chair of the Litigation Department and Labor and Employment section of Flaster Greenberg, P.C. I have served as lead counsel in cases concerning wrongful termination, harassment, discrimination, retaliation, and whistle-blowing, among others.

4. In addition, I have been a contributor to the American Bar Association ("ABA") treatise, *Employment Discrimination Law*, and a chapter editor of the ABA treatise, *Age Discrimination in Employment Law*. I am an active member of the ABA's Employment Rights and Responsibilities Committee, where I serve as the management co-chair of the State Law Developments Subcommittee.

5. I am aware of the credentials and skills of Stephen G. Console, Esquire, and Laura C. Mattiacci, Esquire, having litigated against them and/or their law firm in the past and also having referred cases to them and their law firm.

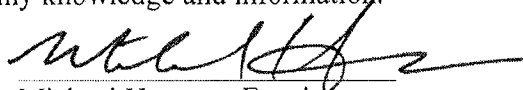
6. I am aware that Mr. Console is the founder and has been a shareholder in the firm of Console Mattiacci Law, LLC (previously called Console Law Offices LLC) in Philadelphia, PA

since 1990. Since 1985, Mr. Console has concentrated his practice in all aspects of employment law, with a special focus on litigation. Mr. Console's background includes a multitude of significant cases that resulted in verdicts and appellate discussions favorable to his clients. He has handled approximately 3,000 employment law cases as counsel for the employee. In addition, he regularly speaks at seminars involving employment law and has done so for over twenty-five (25) years. Mr. Console's requested rate of \$940 per hour is reasonable because it lies within the range of fees charged for work in fee shifting cases by experienced trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local market for lawyers of his level of experience in this field.

7. I am aware that Ms. Mattiacci is a shareholder in the firm of Console Mattiacci Law, LLC. I am aware that she has been in practice since 2002 focusing on employment litigation and that she has vast experience in representing clients in employment cases. I am aware that Ms. Mattiacci was the lead trial counsel on this case and that she has tried numerous jury trials on behalf of plaintiffs, most of which have resulted in verdicts for the plaintiffs. Ms. Mattiacci's requested rate of \$750 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced lead trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local market for lawyers on her level of experience in this field.

9. There is a substantial risk of taking a plaintiff's employment case on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiffs' lawyers cannot take on representation and devote the necessary time to be able to successfully litigate these cases to verdict against experienced defense counsel.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct to the best of my knowledge and information.



Michael Homans, Esquire
HomansPeck, LLC
1500 JFK Blvd.
2 Penn Center, Suite 520
Philadelphia, PA 19102

DATE: October 26, 2018

EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

RUTH BRIGGS,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION NO.
v.	:	16-cv-0248
	:	
TEMPLE UNIVERSITY	:	
	:	
Defendant.	:	
	:	

DECLARATION OF JULIANNE PECK, ESQUIRE

1. I, Julianne Peck, Esquire, make this declaration in support of the Motion of Plaintiff for an award of attorneys' fees and costs in the above-captioned matter.

2. I am a 1995 graduate of Syracuse University College of Law. I have been admitted to practice in Pennsylvania since 1997. I am also admitted to practice before the following federal courts: the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the Western District of Pennsylvania, the United States District Court for the District of New Jersey, and the United States District Court for the Southern District of New York.

3. I am a founding partner of Homans Peck, a boutique law firm based in Philadelphia focusing on labor and employment law and litigation. Before co-founding the firm in 2018, I practiced law for over twenty (20) years at some of the best firms in the region concentrating on litigation of workplace disputes and providing litigation advice to both employers and employees, including Drinker Biddle & Reath, Console Law Offices, and Rubin Fortunato.

4. I have served as lead counsel in cases concerning wrongful termination, harassment, discrimination, retaliation, and whistle-blowing, among others. I regularly advise individual employees, professionals, and executives who are facing workplace disputes with a focus on protecting legal rights. Also, I have successfully resolved hundreds of cases on behalf of my clients through settlement, mediation, and summary judgment as well as having obtained trial verdicts on behalf of my clients.

5. I am aware of the credentials and skills of Stephen G. Console, Esquire, Laura C. Mattiacci, Esquire, and Rahul Munshi, Esquire having co-counseled cases with them and/or their law firm in the past and also having referred cases to them and their law firm.

6. I am aware that Mr. Console is the founder and has been a shareholder in the firm of Console Mattiacci Law, LLC (previously called Console Law Offices LLC) in Philadelphia, PA since 1990. Since 1985, Mr. Console has concentrated his practice in all aspects of employment law, with a special focus on litigation. Mr. Console's background includes a multitude of

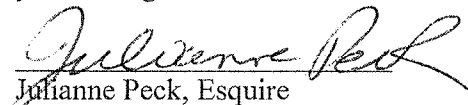
significant cases that resulted in verdicts and appellate discussions favorable to his clients. He has handled approximately 3,000 employment law cases as counsel for the employee. In addition, he regularly speaks at seminars involving employment law and has done so for over twenty-five (25) years. Mr. Console's requested rate of \$940 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local market for lawyers of his level of experience in this field.

7. I am aware that Ms. Mattiacci is a shareholder in the firm of Console Mattiacci Law, LLC. I am aware that she has been in practice since 2002 focusing on employment litigation and that she has vast experience in representing clients in employment cases. I am aware that Ms. Mattiacci was the lead trial counsel on this case and that she has tried numerous jury trials on behalf of plaintiffs, most of which have resulted in verdicts for the plaintiffs. Ms. Mattiacci's requested rate of \$750 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced lead trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local market for lawyers on her level of experience in this field.

8. I am aware that Mr. Munshi is a partner with Console Mattiacci Law, LLC. I am also aware that he joined Console Mattiacci Law, LLC in 2010 after completing a federal judicial clerkship with the Hon. Joel H. Slomsky of the District Court for the Eastern District of Pennsylvania. I am aware that he has significant experience in representing clients in employment cases and that he regularly speaks at seminars involving employment law. Mr. Munshi's requested rate of \$440 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by trial counsel with similar backgrounds, abilities and experience in this field, and is reasonable in light of the local market for lawyers of his level of experience in this field.

9. There is a substantial risk of taking a plaintiff's employment case on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiffs' lawyers cannot take on representation and devote the necessary time to be able to successfully litigate these cases to verdict against experienced defense counsel.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct to the best of my knowledge and information.


Julianne Peck, Esquire
Homans Peck, LLC
43 Paoli Plaza #426
Paoli, PA 19301

DATED: 10/25/18

EXHIBIT 9

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Year	Firm Name	Location	Agency FTE Attorneys	Partner Billing Rate High	Partner Billing Rate Low	Partner Billing Rate Avg	Associate Billing Rate High	Associate Billing Rate Avg	Associate Billing Rate Low	Counsel Avg	Counsel High	NY Billing Source	Notes
2013	Adams and Reese	New Orleans, LA	277	\$650.00	\$275.00	\$390.00	\$320.00	\$200.00	\$250.00	\$450.00	\$500.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Alerman Senterfitt	Miami, FL	502	\$610.00	\$350.00	\$480.00	\$425.00	\$175.00	\$300.00			National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Akin Gump Strauss Hauer & Feld	Washington, DC	806	\$1220.00	\$615.00	\$765.00	\$660.00	\$365.00	\$525.00			National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Allen Matkins Leck Gamble Mallory & Natis	Los Angeles, CA	187	\$680.00	\$525.00	\$615.00						National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Alston & Bird	Atlanta, GA	805	\$875.00	\$485.00	\$675.00	\$575.00	\$280.00	\$425.00			National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Andrews Kurth	Houston, TX	348	\$1090.00	\$745.00	\$895.00	\$1090.00	\$265.00	\$670.00			National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Archer & Greiner	Haddonfield, NJ	208	\$460.00	\$330.00	\$400.00	\$295.00	\$200.00	\$245.00			National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Arent Fox	Washington, DC	323	\$680.00	\$500.00	\$650.00	\$595.00	\$275.00	\$395.00			National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Arnall Golden Gregory	Atlanta, GA	138	\$520.00	\$430.00	\$490.00						National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Arnold & Porter	Washington, DC	748	\$950.00	\$670.00	\$815.00	\$610.00	\$345.00	\$500.00			National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Arnstein & Lehr	Chicago, IL	141	\$595.00	\$380.00	\$465.00	\$350.00	\$175.00	\$250.00			National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Baker & Hostetler	Cleveland, OH	810	\$665.00	\$250.00	\$450.00	\$455.00	\$120.00	\$250.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Baker & McKenzie	Chicago, IL	4004	\$1130.00	\$260.00	\$755.00	\$925.00	\$100.00	\$395.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Baker, Donelson, Bearman, Caldwell & Berkowitz	Memphis, Tenn.	587	\$495.00	\$340.00	\$400.00	\$465.00	\$245.00	\$295.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Ballard Spahr	Philadelphia, PA	479	\$665.00	\$395.00	\$475.00	\$495.00	\$235.00	\$315.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Barnes & Thornburg	Indianapolis, IN	487	\$560.00	\$330.00	\$480.00	\$370.00	\$260.00	\$320.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Beresch, Friedlander, Coplan & Aronoff	Cleveland, OH	150	\$635.00	\$360.00	\$455.00	\$475.00	\$155.00	\$280.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Best Best & Krieger	Riverside, CA	175	\$655.00	\$340.00	\$455.00	\$385.00	\$235.00	\$280.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Bingham McCutchen	Boston, MA	900	\$1080.00	\$220.00	\$795.00	\$605.00	\$185.00	\$450.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Blank Rome	Philadelphia, PA	471	\$940.00	\$445.00	\$640.00	\$565.00	\$175.00	\$530.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Bond, Schoeneck & King	Syracuse, NY	194	\$520.00	\$240.00	\$355.00	\$285.00	\$160.00	\$225.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Bowles Rice	Charleston, WV	128	\$265.00	\$165.00	\$230.00	\$180.00	\$115.00	\$135.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Bracewell & Giuliani	Houston, TX	432	\$1125.00	\$575.00	\$760.00	\$700.00	\$275.00	\$440.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Bradley Arant Boult Cummings	Birmingham, AL	396	\$605.00	\$325.00	\$430.00	\$340.00	\$200.00	\$260.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Broad and Cassel	Orlando, FL	169	\$465.00	\$295.00	\$360.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Brownstein Hyatt Farber Schreck	Denver, CO	216	\$700.00	\$310.00	\$520.00	\$345.00	\$265.00	\$305.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Bryan Cave	St. Louis, MO	950	\$660.00	\$405.00	\$560.00	\$570.00	\$210.00	\$405.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Buchalter Nemer	Los Angeles, CA	134	\$695.00	\$475.00	\$605.00	\$375.00	\$350.00	\$365.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Burr & Forman	Birmingham, AL	249	\$525.00	\$240.00	\$355.00	\$390.00	\$200.00	\$245.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Butzel Long	Bloomfield Hills, MI	125	\$535.00	\$350.00	\$440.00	\$415.00	\$215.00	\$305.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Cadwalader, Wickersham & Taft	New York, NY	435	\$1050.00	\$600.00	\$930.00	\$750.00	\$395.00	\$605.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Carlton Fields	Tampa, FL	276	\$540.00	\$455.00	\$600.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Connell Foley	Roseland, NJ	121	\$575.00	\$275.00	\$425.00	\$325.00	\$200.00	\$255.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Cooley	Palo Alto, CA	632	\$590.00	\$650.00	\$820.00	\$530.00	\$160.00	\$525.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Covington & Burling	Washington, DC	738	\$890.00	\$605.00	\$780.00	\$565.00	\$320.00	\$415.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Cox Smith Matthews	San Antonio, TX	117	\$595.00	\$385.00	\$505.00	\$485.00	\$230.00	\$320.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Cozen O'Connor	Philadelphia, PA	509	\$1050.00	\$300.00	\$555.00	\$590.00	\$235.00	\$345.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Curtis, Mallet-Prevost, Colt & Mosle	New York, NY	322	\$860.00	\$730.00	\$800.00	\$785.00	\$345.00	\$480.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Davis Graham & Stubbs	Denver, CO	146	\$595.00	\$350.00	\$435.00	\$340.00	\$160.00	\$245.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Davis Polk & Wardwell	New York, NY	787	\$985.00	\$850.00	\$975.00	\$975.00	\$130.00	\$615.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Debevoise & Plimpton	New York, NY	615	\$1075.00	\$655.00	\$1055.00	\$760.00	\$120.00	\$480.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Dechert	New York, NY	803	\$1085.00	\$675.00	\$900.00	\$735.00	\$395.00	\$530.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Dentons			\$1050.00	\$545.00	\$700.00	\$885.00	\$210.00	\$425.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Dickstein Shapiro	Washington, DC	538	\$1250.00	\$550.00	\$750.00	\$565.00	\$310.00	\$475.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Dinsmore & Shohl	Cincinnati, OH	422	\$550.00	\$250.00	\$400.00	\$350.00	\$140.00	\$235.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 DLA Piper	New York, NY	4036	\$1025.00	\$450.00	\$765.00	\$750.00	\$250.00	\$510.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Dorsey & Whitney	Minneapolis, MN	517	\$585.00	\$340.00	\$435.00	\$510.00	\$215.00	\$315.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Duane Morris	Philadelphia, PA	613	\$710.00	\$430.00	\$620.00	\$490.00	\$295.00	\$370.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Edwards Wildman Palmer	Boston, MA	572	\$765.00	\$210.00	\$535.00	\$415.00	\$245.00	\$325.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Faegre Baker Daniels	Minneapolis, MN	683	\$580.00	\$355.00	\$455.00	\$315.00	\$110.00	\$260.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Foley & Lardner	Milwaukee, WI	872	\$860.00	\$405.00	\$600.00	\$470.00	\$210.00	\$335.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Foley Hoag	Boston, MA	223	\$775.00	\$590.00	\$670.00	\$385.00	\$290.00	\$325.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Fox Rothschild	Philadelphia, PA	480	\$750.00	\$335.00	\$530.00	\$500.00	\$245.00	\$310.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Fried, Frank, Harris, Shriver & Jacobson	New York, NY	476	\$1100.00	\$930.00	\$1000.00	\$760.00	\$375.00	\$895.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Gardere Wynne Sewell	Dallas, TX	223	\$775.00	\$430.00	\$635.00	\$445.00	\$235.00	\$310.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Gibbons	Newark, NJ	210	\$665.00	\$440.00	\$560.00	\$475.00	\$295.00	\$360.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Gibson, Dunn & Crutcher	New York, NY	1086	\$1800.00	\$765.00	\$980.00	\$930.00	\$175.00	\$560.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Gordon & Rees	San Francisco, CA	457	\$475.00	\$375.00	\$420.00	\$325.00	\$285.00	\$300.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Greenberg Traurig	New York, NY	1699	\$955.00	\$360.00	\$555.00	\$595.00	\$200.00	\$390.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Harris Beach	Rochester, NY	204	\$600.00	\$295.00	\$385.00	\$235.00	\$175.00	\$260.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Harter Secrest & Emery	Rochester, NY	136	\$465.00	\$300.00	\$385.00	\$290.00	\$195.00	\$250.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Heynes and Boone	Dallas, TX	489	\$1020.00	\$450.00	\$670.00	\$380.00	\$310.00	\$405.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Hogan Lovells	Washington, DC	2280	\$1000.00	\$705.00	\$635.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Holland & Hart	Denver, CO	409	\$725.00	\$285.00	\$435.00	\$415.00	\$165.00	\$275.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Holland & Knight	Washington, DC	925	\$1035.00	\$335.00	\$595.00	\$575.00	\$210.00	\$325.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Honigman Miller Schwartz and Cohn	Detroit, MI	227	\$560.00	\$250.00	\$390.00	\$225.00	\$205.00	\$220.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Hughes Hubbard & Reed	New York, NY	344	\$995.00	\$725.00	\$690.00	\$675.00	\$365.00	\$555.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Husch Blackwell	St. Louis, MO	514	\$625.00	\$235.00	\$430.00	\$465.00	\$180.00	\$260.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Ice Miller	Indianapolis, IN	301	\$530.00	\$335.00	\$450.00	\$305.00	\$245.00	\$270.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Irell & Manella	Los Angeles, CA	164	\$975.00	\$600.00	\$990.00	\$750.00	\$395.00	\$535.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Jackson Kelly	Charleston, WV	280	\$370.00	\$175.00	\$280.00	\$265.00	\$145.00	\$195.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jackson Lewis	Los Angeles, CA	690	\$440.00	\$310.00	\$380.00	\$315.00	\$275.00	\$290.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jackson Walker	Dallas, TX	328	\$550.00	\$450.00	\$500.00	\$385.00	\$255.00	\$335.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jaffer, Mangels, Butler & Mitchell	Los Angeles, CA	126	\$975.00	\$560.00	\$560.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jenner & Block	Chicago, IL	492	\$925.00	\$565.00	\$745.00	\$550.00	\$380.00	\$455.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jones Day	New York, NY	2350	\$975.00	\$445.00	\$745.00	\$775.00	\$205.00	\$435.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jones Walker	New Orleans, LA	361	\$425.00	\$275.00	\$385.00	\$240.00	\$200.00	\$225.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kasowitz, Benson, Torres & Friedman	New York, NY	365	\$1185.00	\$600.00	\$835.00	\$625.00	\$200.00	\$340.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kaiten Muchin Rosenman	Chicago, IL	586	\$745.00	\$500.00	\$615.00	\$595.00	\$340.00	\$455.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kaye Scholer	New York, NY	414	\$1080.00	\$715.00	\$860.00	\$860.00	\$320.00	\$510.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kelley Drye & Warren	New York, NY	296	\$815.00	\$435.00	\$640.00	\$600.00	\$305.00	\$430.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kippatrick Townsend & Stockton	Atlanta, GA	552	\$775.00	\$400.00	\$550.00	\$475.00	\$345.00	\$385.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 King & Spalding	Atlanta, GA	838	\$595.00	\$545.00	\$775.00	\$735.00	\$125.00	\$460.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kirkland & Ellis	Chicago, IL	1517	\$595.00	\$580.00	\$825.00	\$715.00	\$235.00	\$540.00	National Law Journal, December 2013	published in April 2013, Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Krobb, Martens, Olson & Bear	Irvine, CA	268	\$785.00	\$440.00	\$555.00	\$535.00	\$295.00	\$345.00	National Law Journal, December 2013	published in April 2013, Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kramer Levin Naftalis & Frankel	New York, NY	320	\$1025.00	\$740.00	\$945.00	\$750.00	\$400.00	\$590.00	National Law Journal, December 2013	published in April 2013, Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Lane Powell	Seattle, WA	172	\$465.00	\$365.00	\$430.00	\$330.00	\$225.00	\$265.00	National Law Journal, December 2013	published in April 2013, Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Latham & Watkins	New York, NY	2033	\$1110.00	\$885.00	\$990.00	\$725.00	\$465.00	\$605.00	National Law Journal, December 2013	published in April 2013, Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Lathrop & Gage	Kansas City, MO	286	\$700.00	\$285.00	\$420.00	\$375.00	\$195.00	\$250.00	National Law Journal, December 2013	published in April 2013, Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Leonard, Street and Deinard	Minneapolis, MN	184	\$490.00	\$285.00	\$405.00	\$305.00	\$265.00	\$285.00	National Law Journal, December 2013	published in April 2013, Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Lewis Roca Rothgerber			\$695.00	\$380.00	\$565.00	\$525.00	\$205.00	\$400.00	National Law Journal, December 2013	published in April 2013, Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Lindquist & Vannum	Minneapolis, MN	181	\$600.00	\$460.00	\$520.00	\$470.00	\$275.00	\$365.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Litter Mendelson	San Francisco, CA	909	\$515.00	\$355.00	\$550.00	\$420.00	\$245.00	\$290.00	National Law Journal, December 2013	published in April 2013, Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Lowenstein Sandler	Roseland, NJ	254	\$755.00	\$510.00	\$615.00	\$650.00	\$280.00	\$380.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Manatt, Phelps & Phillips	Los Angeles, CA	325	\$785.00	\$640.00	\$740.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McCarter & English	Newark, NJ	375	\$625.00	\$450.00	\$530.00	\$370.00	\$220.00	\$300.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McDermott Will & Emery	Chicago, IL	1024	\$835.00	\$525.00	\$710.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McElroy, Deutsch, Mulvaney & Carpenter	Monmouth, NJ	288	\$505.00	\$325.00	\$440.00	\$325.00	\$200.00	\$295.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McGuireWoods	Richmond, VA	941	\$725.00	\$450.00	\$595.00	\$525.00	\$285.00	\$560.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McKenna Long & Aldridge	Atlanta, GA	509	\$650.00	\$480.00	\$530.00	\$425.00	\$375.00	\$385.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Michael Best & Friedrich	Milwaukee, WI	198	\$650.00	\$260.00	\$445.00	\$350.00	\$190.00	\$275.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Miles & Stockbridge	Baltimore, MD	207	\$725.00	\$330.00	\$470.00	\$375.00	\$230.00	\$285.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Miller & Martin	Chattanooga, TN	133	\$585.00	\$245.00	\$365.00	\$270.00	\$180.00	\$215.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Morgan, Lewis & Bockius	Philadelphia, PA	1334	\$765.00	\$430.00	\$620.00	\$585.00	\$270.00	\$390.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Morris, Manning & Martin	Atlanta, GA	142	\$575.00	\$400.00	\$480.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Morrison & Foerster	San Francisco, CA	1010	\$1185.00	\$585.00	\$865.00	\$725.00	\$230.00	\$525.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Nixon Peabody	Boston, MA	612	\$550.00	\$295.00	\$520.00	\$550.00	\$180.00	\$300.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Norton Rose Fulbright			\$900.00	\$525.00	\$775.00	\$515.00	\$300.00	\$400.00	National Law Journal, December 2013	published in April 2013. Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Nutter McClennen & Fish	Boston, MA	135	\$715.00	\$470.00	\$575.00	\$480.00	\$295.00	\$375.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 O'Melveny & Myers	Los Angeles, CA	738	\$950.00	\$615.00	\$715.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Orrick, Herrington & Sutcliffe	San Francisco, CA	977	\$945.00	\$305.00	\$625.00	\$675.00	\$170.00	\$310.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Parker Poe Adams & Bernstein	Charlotte, NC	178	\$500.00	\$425.00	\$450.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Patton Boggs	Washington, DC	485	\$780.00	\$490.00	\$665.00	\$475.00	\$325.00	\$405.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Paul Hastings	New York, NY	899	\$900.00	\$750.00	\$915.00	\$755.00	\$335.00	\$540.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Paul, Weiss, Rifkind, Wharton & Garrison	New York, NY	803	\$1120.00	\$760.00	\$1043.00	\$760.00	\$250.00	\$600.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Pepper Hamilton	Philadelphia, PA	453	\$650.00	\$475.00	\$632.00	\$460.00	\$245.00	\$360.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Perkins Cole	Seattle, WA	823	\$940.00	\$320.00	\$600.00	\$595.00	\$215.00	\$405.00	\$665.00	\$270.00	\$790.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Pillsbury Winthrop Shaw Pittman	Washington, DC	609	\$1070.00	\$615.00	\$885.00	\$860.00	\$375.00	\$520.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Polismetti	Kansas City, MO	573	\$750.00	\$320.00	\$410.00	\$340.00	\$220.00	\$285.00	\$370.00	\$300.00	\$425.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Proskauer Rose	New York, NY	745	\$950.00	\$725.00	\$880.00	\$875.00	\$295.00	\$465.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Quarles & Brady	Milwaukee, WI	413	\$600.00	\$350.00	\$470.00	\$600.00	\$210.00	\$335.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Quinn Emanuel Urquhart & Sullivan	New York, NY	697	\$1075.00	\$810.00	\$915.00	\$675.00	\$320.00	\$410.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Reed Smith	Pittsburgh, PA	1468	\$945.00	\$545.00	\$710.00	\$530.00	\$295.00	\$420.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Richards, Layton & Finger	Wilmington, DE	138	\$850.00	\$475.00	\$680.00	\$450.00	\$250.00	\$350.00	\$485.00	\$450.00	\$475.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Riker Danzig Scherer Hyland & Perretti	Morrisstown, NJ	151	\$485.00	\$430.00	\$455.00	\$295.00	\$210.00	\$250.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Robinson & Cole	Hartford, CT	209	\$490.00	\$285.00	\$410.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Rutan & Tucker	Costa Mesa, CA	139	\$875.00	\$345.00	\$490.00	\$500.00	\$230.00	\$320.00	\$480.00	\$435.00	\$575.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Saul Ewing	Philadelphia, PA	226	\$850.00	\$365.00	\$550.00	\$575.00	\$225.00	\$340.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Sedgwick	San Francisco, CA	347	\$615.00	\$305.00	\$425.00	\$475.00	\$250.00	\$325.00	\$450.00	\$350.00	\$660.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Seward & Kissel	New York, NY	132	\$850.00	\$625.00	\$735.00	\$600.00	\$290.00	\$400.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Seyfarth Shaw	Chicago, IL	753	\$860.00	\$375.00	\$610.00	\$505.00	\$225.00	\$365.00	\$470.00	\$245.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Sheppard, Mullin, Richter & Los Angeles, Hampton	Los Angeles, CA	521	\$875.00	\$490.00	\$665.00	\$535.00	\$275.00	\$415.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Shumaker, Loop & Kendrick	Toledo, OH	226	\$585.00	\$295.00	\$405.00	\$335.00	\$175.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Shurtz & Bowen	Miami, FL	221	\$660.00	\$250.00	\$430.00	\$345.00	\$195.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Skadden, Arps, Slate, Meagher & Flom	New York, NY	1735	\$1150.00	\$645.00	\$1035.00	\$845.00	\$340.00	\$620.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Snel & Wilmer	Phoenix, AZ	422	\$695.00	\$295.00	\$495.00	\$420.00	\$185.00	\$280.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Squire Sanders	Cleveland, OH	1257	\$350.00	\$350.00	\$655.00	\$530.00	\$250.00	\$365.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Stevens & Lee	Reading, PA	167	\$600.00	\$525.00	\$625.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Stinson Morrison Hecker	Kansas City, MO	280	\$695.00	\$290.00	\$475.00	\$650.00	\$185.00	\$280.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Stoei Rives	Portland, OR	371	\$690.00	\$320.00	\$475.00	\$425.00	\$190.00	\$280.00	\$410.00	\$320.00	\$550.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Strasburger & Price	Dallas, TX	208	\$770.00	\$225.00	\$420.00	\$450.00	\$215.00	\$290.00	\$445.00	\$225.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Tatt, Stetinius & Hollister	Cincinnati, OH	303	\$535.00	\$285.00	\$415.00	\$475.00	\$200.00	\$285.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Thompson & Knight	Dallas, TX	281	\$740.00	\$435.00	\$535.00	\$610.00	\$240.00	\$370.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Thompson Coburn	St. Louis, MO	305	\$510.00	\$330.00	\$440.00	\$350.00	\$220.00	\$270.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Troutman Sanders	Atlanta, GA	575	\$975.00	\$400.00	\$620.00	\$570.00	\$245.00	\$340.00	\$510.00	\$325.00	\$675.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Ulmer & Berne	Cleveland, OH	178	\$415.00	\$315.00	\$380.00							National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Varnum	Grand Rapids, MI	134	\$465.00	\$280.00	\$390.00							National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Venable	Washington, DC	501	\$1075.00	\$470.00	\$660.00	\$575.00	\$295.00	\$430.00	\$565.00	\$435.00	\$810.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Vinson & Elkins	Houston, TX	677	\$770.00	\$475.00	\$600.00	\$565.00	\$275.00	\$390.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Waller Lansden Dortch & Davis	Nashville, TN	165	\$600.00	\$350.00	\$460.00	\$335.00	\$190.00	\$245.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Weil Gotshal & Manges	New York, NY	1201	\$1075.00	\$625.00	\$930.00	\$780.00	\$300.00	\$600.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 White & Case	New York, NY	1900	\$1050.00	\$700.00	\$975.00	\$1050.00	\$220.00	\$525.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Wiley Rein	Washington, DC	272	\$950.00	\$550.00	\$665.00	\$535.00	\$320.00	\$445.00	\$580.00	\$380.00	\$800.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Williams Mullen	Richmond, VA	231	\$410.00	\$560.00	\$385.00	\$350.00	\$260.00	\$295.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Wilkie Farr & Gallagher	New York, NY	540	\$1090.00	\$790.00	\$950.00	\$790.00	\$350.00	\$560.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Wilmer Cutler Pickering Hale and Dorr	Washington, DC	561	\$1250.00	\$735.00	\$905.00	\$695.00	\$75.00	\$290.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Winston & Strawn	Chicago, IL	842	\$995.00	\$650.00	\$800.00	\$590.00	\$425.00	\$620.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Wolff & Samson	West Orange, NJ	129	\$450.00	\$325.00	\$400.00	\$450.00	\$225.00	\$340.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Wyatt, Tarrant & Combs	Louisville, KY	165	\$500.00	\$280.00	\$418.00							National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

EXHIBIT 10

10/26/18

Client Cost Transaction Detail Report

Accrual Basis

All Transactions

Date	Num	Name	Source Name	Memo	Debit	Credit	Balance
03/12/2016	Online	Briggs, Ruth	American Express	1/20/16 efilng	400.00		400.00
07/13/2016	Online	Briggs, Ruth	Federal Express	7/7/16 to Francine Friedman Griesing	29.53		429.53
07/22/2016	Online	Briggs, Ruth	Federal Express	7/11/16 to Francine Friedman Griesing	15.76		445.29
10/17/2016	18599	Briggs, Ruth	PACER	PACER research July-Sept 2016	0.20		445.49
02/27/2017	18961	Briggs, Ruth	Intercept Delivery Service	1/31/17 to Littler Mendelson	6.75		452.24
05/08/2017	19099	Briggs, Ruth	PACER	Jan-March 217 PACER research	0.20		452.44
05/31/2017	19174	Briggs, Ruth	Rahul Munshi	5/25/17 Cab from deposition	10.15		462.59
06/20/2017	Online	Briggs, Ruth	Federal Express	6/12/17 to Ruth Briggs	23.44		486.03
07/10/2017	19198	Briggs, Ruth	Terry Burke	5/31/17 Dep of Jie Wu	638.05		1,124.08
07/10/2017	19200	Briggs, Ruth	Elite Litigation Solutions, LLC	5/25/17 Videotape dep of Ruth Briggs	2,347.55		3,471.63
07/11/2017	19215	Briggs, Ruth	Terry Burke	6/30/17 Deps of Culbreath-Walton and ...	703.80		4,175.43
07/11/2017	19215	Briggs, Ruth	Terry Burke	6/29/17 Dep of Wacker	441.35		4,616.78
07/31/2017	19283	Briggs, Ruth	Intercept Delivery Service	7/12/17 to Littler Mendelson	4.75		4,621.53
07/31/2017	5259	Briggs, Ruth	Elite Litigation Solutions, LLC	7/21/17 Dep of Ruth Briggs day 2	602.50		5,224.03
09/12/2017	19406	Briggs, Ruth	Relx Inc. DBA LexisNexis	August 2017 Lexis research	138.34		5,362.37
10/04/2017	19444	Briggs, Ruth	Intercept Delivery Service	8/9/17 to USDC	4.75		5,367.12
11/06/2017	19516	Briggs, Ruth	PACER	PACER research July-Sept 2017	5.50		5,372.62
07/03/2018	6-232...	Briggs, Ruth	Federal Express	Federal Express	29.31		5,401.93
07/13/2018	20141	Briggs, Ruth	Rahul Munshi	Daily taxi to and from trial	89.48		5,491.41
07/16/2018	20133	Briggs, Ruth	Rahul Munshi	Cab to Office	12.66		5,504.07
07/16/2018	20133	Briggs, Ruth	Rahul Munshi	Cab to office	33.52		5,537.59
07/16/2018	20133	Briggs, Ruth	Rahul Munshi	Cab from office	28.82		5,566.41
07/16/2018	20133	Briggs, Ruth	Rahul Munshi	Cab to court	9.75		5,576.16
07/16/2018	20133	Briggs, Ruth	Rahul Munshi	Cab from Court to office	13.44		5,589.60
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Toll - Tech Run	15.00		5,604.60
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Parking - Tech Run	15.00		5,619.60
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Meals for Trial Team	17.28		5,636.88
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Beverages for Trial Team	10.00		5,646.88
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Tolls - Tech Run	15.00		5,661.88
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Parking	14.00		5,675.88
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Beverages for Trial Team	8.00		5,683.88
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Train	2.80		5,686.68
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Mileage to Court	24.50		5,711.18
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Mileage to Court	24.50		5,735.68
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Mileage to Court	24.50		5,760.18
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Mileage to Court	24.50		5,784.68
07/26/2018	20147	Briggs, Ruth	Charlene Bates	Meals for Trial Team	33.75		5,818.43
08/22/2018	CONL...	Briggs, Ruth	Intercept Delivery Service	Courier to US District Court	43.13		5,861.56
08/22/2018	CONL...	Briggs, Ruth	Intercept Delivery Service	Courier to US District Court	110.10		5,971.66
08/29/2018	1804137	Briggs, Ruth	Road Runner Courier Agency, Inc.	Hand Delivery to Judge Robert Kely	65.95		6,037.61
09/09/2018	CCON...	Briggs, Ruth	Intercept Delivery Service	Courier to District Court	4.75		6,042.36
Total					6,042.36	0.00	6,042.36